

**BEFORE THE HEARINGS PANEL OF THE GREATER WELLINGTON REGIONAL COUNCIL**

**IN THE MATTER** of the Resource Management Act

**AND**

**IN THE MATTER** Proposed Natural Resource Plan –  
Hearing Stream 1 - Overall policy  
framework of the proposed plan:  
Beneficial use and development Areas:  
and, sites with significant mana  
whenua values - appearing on behalf of  
Wellington Electricity lines Limited –  
Submitter 126 and Further Submission  
FS73

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**STATEMENT OF EVIDENCE BY TIM LESTER**

**DATED 22<sup>nd</sup> DAY OF May 2017**

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## **1.0 INTRODUCTION**

- 1.1 My name is Tim Lester. I am a Resource Management Consultant with Edison Consulting Group and I am presenting evidence based on a submission and further submission that was lodged on behalf of Wellington Electricity Lines Limited (WELL).
- 1.2 I hold a Masters Degree in Resource and Regional Planning from the University of Otago, and have over 12 years' experience in the field of environmental management and regulation in New Zealand and Australia – the past 5 of these years have been with a specific involvement within the electrical supply industry in New Zealand.
- 1.2 I am joined here today by Mr Sol Friedman who is the Asset and Planning Manager for WELL. Mr Friedman will provide an overview of WELL's operations and assets contained within the Wellington Region – which in doing so provide an appreciation to the hearings panel of the regional scale of the distribution network.
- 1.3 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note and that I agree to comply with the code. My evidence in this statement is within my area of expertise. I have not omitted to consider material facts known to me that might alter to detract from the opinions which I express.
- 1.3 The purpose of attending this hearing meeting is to reiterate and expand upon the appropriate key points contained within WELL's written submissions on the Greater Wellington Regional Council's (Council) Proposed Natural Resource Plan (PNRP), as well as to respond to the recommendations made in the S42A Planners Report.
- 1.4 WELL are an original submitter on the PNRP (S126), as well as providing further submissions (FS73). I was the principal author of WELL's submissions.

## **2.0 SCOPE OF PRESENTATION**

- 2.1 I acknowledge that, given the breadth of the PNRP coverage, Council has adopted a topic by topic hearing program with the matters to be addressed here today being those limited to Hearing Stream 1. Hence, the scope of my evidence will be applicable to such matters identified in the PNRP relating to: Part B: Overall policy framework of the proposed plan: Beneficial use and development: Areas: and, sites with significant mana whenua values.

- 2.2 More specifically, my evidence will be contained to those matters applicable to beneficial use and development, in which Interpretation (Chapter 2) of the PNRP is subject to a planning analysis and recommendation.
- 2.3 The primary reason for my evidence is to articulate a key concern that underpins a number of concurrent submission points that WELL have made on the PNRP – this concern being the proposed definition for Regionally Significant Infrastructure in the Interpretation section of the PNRP.
- 2.4 Notwithstanding this concern, and as stated in Section 2 of the submission – WELL is generally supportive of the PNRP. In particular, this support is based on how the document identifies and addresses elements of the Wellington Region’s integrated approach to the management of the region’s natural and physical resource.
- 2.5 Whilst acknowledging this support in principle – my statement of evidence seeks to demonstrate that without accommodating WELL’s key concern, the regional plan will not provide an integrated approach to managing the region’s natural and physical resources - particularly in regard to enabling the operation and development of the region’s critical electricity distribution infrastructure. This limitation is directed to how the term *Regionally Significant Infrastructure* is proposed to be interpreted and applied, throughout the document.

### **3.0 Overview of WELL Network and Operations in the Wellington Region**

- 3.1 Mr Friedman is WELL’s Asset & Planning Manager and will give a presentation providing an overview of WELL’s operations and role in the Wellington region.
- 3.2 For the sake of timeliness, I will not duplicate the information provided in Mr Friedman’s presentation – least to mention that the breadth of WELL’s distribution network covers both low-voltage local service connections, as well as the high-voltage sub-transmission network at a regional scale.

### **4.0 WELL’s Submission**

- 4.1 WELL’s submission traversed a number of topics contained within the PNRP as they relate to ensuring that electricity distribution network assets and operations were adequately provided for and that appropriate recognition was given to the benefits of network utility infrastructure, in general, and Regionally Significant Infrastructure, in particular, and the important and integral contribution the network makes to the region.

- 4.2 The underlying purpose of WELL's submission was to enable the importance of critical distribution infrastructure across the region to be recognised, and therefore subject to the Beneficial Use and Development provisions of the regional plan.
- 4.3 To achieve this as concisely as possible, the submission sought to have the definition for Regionally Significant Infrastructure include the following sub-points:
- facilities for the generation, transmission and distribution of electricity.
  - a network (as defined in the Electricity Industry Act 2010).
- 4.4 The intention of including reference to 'a network (as defined in the The Electricity Industry Act 2010)' was because, by definition, it includes those parts of transmission lines that are not part of the National Grid, and furthermore would clarify the definition's coverage of non-Grid transmission.
- 4.5 I note that this submission point was supported by FS32/005 (Meridian Energy Ltd), as, in part, it was agreed that the proposed RSI definition was muddled in regard to its coverage of electricity infrastructure not contained within Transpowers' National Grid.
- 4.6 I also note that Transpower NZ Ltd (in FS22/004) provided a further submission that was not in opposition to the sought amendments.
- 4.7 Throughout WELL's submission, the primary vehicle in the PNRP for such recognition is Section 2 – Interpretation. Having a reflective definition of Regionally Significant Infrastructure is deemed critical by WELL, as currently the proposed definition of Regionally Significant Infrastructure, excludes the distribution network by referring to Electricity Transmission Infrastructure (i.e., the National Grid), and the supply of electricity to the electricity network (as opposed to within the network).
- 4.8 The importance of appropriately providing Regionally Significant Infrastructure coverage for electricity distribution binds a number of subsequent points made by WELL in regard to development, maintenance and protection of such infrastructure throughout the Wellington region.
- 4.9 Through amending the definition as sought, consequential support or sought amendments to the following 13 provisions were provided by WELL:

*Objective O12*

*Policy P143*

*Objective O13*

*Policy P144*

*Policy P12*

*Policy P147*

*Policy P13*

*Policy P148*

Policy P14

Rule R104

Policy P138

Rule R197

Policy P139

- 4.10 Simply put, WELL's submission was based on the fact that, without appropriate recognition for WELL's critical sub-transmission and lifeline service infrastructure in the operative plan's definitions, the effective provision of such services will be significantly limited throughout the document's implementation.

## 5.0 Section 42A Report

- 5.1 The s42A report (Planners report), has assessed the submission points relevant to Hearings Stream 1 and in particular, to the Topic: *Beneficial Use and Development*.

- 5.2 Upon review of the planners report, I note that WELL's substantive submission regarding the RSI definition is not recommended to be accepted by Council.

- 5.3 The principal reason given in the report is on page 60 (paragraph 265) where it states:

*"The facilities referred to in the definition do not include the local electricity network which includes street level power poles and power lines. The submitters' request would in essence dilute the definition of regionally significant infrastructure to apply to the local electricity network and this is not the intent. The amendment would also have consequences for the implementation of other provisions in the proposed Plan that refers to Regionally Significant Infrastructure."*

- 5.4 I agree that the purpose of the RSI definition is to identify what is regionally significant, and to specify which elements of an infrastructure network provides regional scale benefits. In this regard, I can understand the planner's sentiment that, in isolation, undefined street level power pole and powerlines do not meet the threshold of being regionally significant – this understanding is tempered by the fact that an electricity distribution network is not solely defined by street level power poles and power lines.

- 5.5 I do not agree with the planners overall recommendation not to amend the RSI definition. This is because there is a lack of analysis in the assessment in regard to the regional function of WELL's distribution infrastructure – a point comprehensively outlined in WELL's initial submission – and as reiterated in the presentation provided by Mr Friedman in support of my evidence.

- 5.6 The role and function of WELL's distribution network (inclusive of sub-transmission and critical lines and zone substations) have regional significance and operate above and

beyond local street power level poles and powerlines. To refer back to the submission, WELL's distribution network:

- *Is recognised as a significant physical resource in the RPS*
- *Transmits and distributes a critical supply of electricity across three expansive areas within the Wellington region.*
- *Distribution networks are recognised in a number of other Regional Plans across the country as Regionally Significant Infrastructure.*
- *Provides a secure supply of electricity across the region that is critical to the safe and efficient functioning of modern society.*

5.7 As explained in the submission, and supported graphically with network maps, the Region's electricity distribution network takes high-voltage electricity from the nationally significant National Grid (taken from 9 Transpower substations across the Wellington region), and strategically transmits it at a regional scale (high voltage – 11kV or higher) across large, geographically diverse, areas before being appropriately regulated at the local level for consumer use.

5.8 If not appropriately regulated or protected, such function of the electricity distribution network has the potential to cut power to significant populations in the event of an outage, (such as the June 2013 storm that effected the region where 22,000 consumers were without electricity supply at the peak of the storm, while over the course of the storm around 60,000 consumers were impacted by supply interruptions). I therefore contend the sub-transmission electricity networks to be significant at a regional scale, and not just limited to local level service connections. Consequently, I consider that electricity distribution infrastructure use and beneficial development need to be appropriately recognised in the Operative Natural Resource Plan.

5.9 I do not consider that the planner's report has adequately acknowledged, or subjected a robust analysis to, the role and function of the Wellington Region's electricity distribution network above that of local power poles and powerlines. Without such analysis, the recommendation not to have the regionally significant aspects of WELL's network explicitly recognised, protected and enabled in the operative NPS is not based on a complete decision making process.

## **6.0 Regionally Significant Infrastructure: Concurrent Submission Points**

6.1 As stated earlier in my evidence, the key aspect of the proposed plan appropriately recognising the electricity distribution network as regionally significant infrastructure in

Section 2 (Interpretation), is that many of WELL's concurrent submission points stem from the sought amendment to the definition.

- 6.2 As the recommendation in the planners report is for there to be no change to the RSI definition – then by default, 13 other consequential submissions points raised by WELL will instantly become redundant – regardless of whether the s42A report recommends to accept them.
- 6.3 As a contingency to the above, the submission prepared by WELL sought to have each submission point reference that, if the RSI definition was not amended as sought (or similar) – then an appropriate objective policy set would be required to simultaneously recognise and protect the beneficial use and development for the regionally significant components of the electricity distribution network.
- 6.4 The reason for this contingency approach was addressed for the reasons outlined throughout my evidence – these being the benefits derived to the region from an effective and efficient electricity distribution network.
- 6.5 The reasons for the planners report not to accept these contingencies have been addressed in 'Issue 4' of the report – and erroneously are based primarily on a limited understanding, and assessment, of the regional scale and significance of the distribution network function.
- 6.6 In summary of the s42A report – I consider that the assessment of WELL's submission is incorrect as the recommendation not to amend the RSI definition is based only on local level service provision of the network. The undefined local level (or low-voltage) component of WELL's network received only cursory mention in the submission – yet the planner's report has based its assessment on this one isolated component.
- 6.7 Based on my evidence, it is requested that the hearings panel reconsider the substantive points in WELL's submission – which, in doing so, do not accept the planner's recommendation, and that appropriate recognition is made in the Natural Resource Plan for the beneficial use and development of the region's regionally significant components of the electricity distribution network.

## **7 CONCLUSION**

- 7.1 WELL welcome the opportunity to be involved in the development of the Proposed Natural Resource Plan. Through this process WELL seeks to ensure that its distribution assets are appropriately recognised as regionally significant and protected from the potential adverse

effects of other activities, and that provision is made for operation, repair, upgrading and maintenance activities while appropriately managing potential adverse effects.

7.2 As a final statement, I wish the panel to note that the PNRP recognises the following as Regionally Significant Infrastructure:

- Pipelines for the distribution of gas or petroleum
- Strategic facilities to the radio and telecommunication networks
- Local authority water supply network
- Strategic Transport Network
- Wellington Airport
- Port Area and Wellington Harbour

The above are all totally dependent on electricity from the distribution network to operate. Apart from very limited back-up generation in some cases, all the above facilities would cease operations if electricity supply to them was not available. So it doesn't make sense that the above are all recognised as Regionally Significant Infrastructure, but the utility that owns the infrastructure that supplies the electricity that keeps the above functioning is not.

7.3 In my view the amendments sought by WELL on provisions contained in the proposed plan will promote the sustainable management of natural and physical resources and will assist WELL in delivering a robust and reliable power distribution network regionally.

Signed

Tim Lester

Consultant to Wellington Electricity Lines Limited

Dated the 22<sup>nd</sup> day of May 2017